



NORTH AMERICA SOUTH AMERICA EUROPE ASIA

200 Park Avenue  
New York, NY 10166  
T +1 (212) 294-6700  
F +1 (212) 294-4700

**SEAN R. ANDERSON**

Partner  
(212) 294-5388  
sranderson@winston.com

February 14, 2024

**Via ECF**

The Honorable Denise L. Cote, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

**RE: *Hsuanyeh Law Group PC v. Winston & Strawn LLP et al.*, 1:23-cv-11193-DLC  
(S.D.N.Y.) – First Request for an Extension of Time to Respond to Complaint and  
Adjournment of Initial Pretrial Conference**

Dear Judge Cote:

The undersigned represent defendants Winston & Strawn LLP, Michael R. Rueckheim, Ya-Chiao Chang, Vivek V. Krishnan, and Evan D. Lewis (“Defendants”) in the above-referenced case. Pursuant to Rule 1(E) of the Court’s Individual Practices in Civil Cases and the Notice of Initial Pretrial Conference (ECF No. 20), Defendants respectfully request an extension of time to respond to Plaintiff’s Complaint (ECF No. 1) and an adjournment of the Initial Pretrial Conference to a date following Defendants’ response.

Defendants’ current deadline to answer or otherwise respond to Plaintiff’s Complaint is February 26, 2024. Defendants respectfully request a 30-day extension of this deadline, until March 27, 2024. Should the Court grant this extension, Defendants also respectfully request an adjournment of the Initial Pretrial Conference currently scheduled for March 6, 2024 to a date after Defendants’ deadline to answer or otherwise respond to the Complaint.

This is Defendants’ first request for an extension of time to answer or otherwise respond to the Complaint and first request for an adjournment of the Initial Pretrial Conference. Defendants request the adjournment of the Initial Pretrial Conference so that it follows their response to the Complaint. Counsel for the parties are available for an Initial Pretrial Conference at any time on Friday, April 5, 2024 or Friday, April 12, 2024. Counsel can provide additional dates in May if necessary.

Plaintiff’s counsel has consented to both the requested extension of the time to answer or otherwise respond to the Complaint and the adjournment of the Initial Pretrial Conference. The requested extension and adjournment will not affect any other currently scheduled dates.

Defendants thank Your Honor in advance for the Court’s attention to this matter.



February 14, 2024  
Page 2

Respectfully submitted,

/s/ Sean R. Anderson

Sean R. Anderson  
WINSTON & STRAWN LLP  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 294-6700  
Facsimile: (212) 294-4700  
Email: [sranderson@winston.com](mailto:sranderson@winston.com)

cc: All Counsel of Record (via ECF)